

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Administration of the North  
American Numbering Plan  
Carrier Identification Codes (CICs)

CC Docket No. 92-237

COMMENTS OF BELL ATLANTIC

MCI claims that there is an "impasse" within the telecommunications industry about the wording of the announcement callers will hear when they dial five-digit access codes after the transition to seven-digit codes and that Commission action is necessary to resolve this impasse.<sup>1</sup> This is incorrect. The fact is that MCI is asking the Commission to overturn a consensus agreement reached by the telecommunications industry over MCI's lone dissenting vote. MCI's real motive is obvious — it wants to delay the transition to four-digit carrier identification codes ("CICs") in order to continue to enjoy the advantage that its more than 20 three-digit CICs now give it. Bell Atlantic<sup>2</sup> urges the Commission to promptly reject MCI's request and to allow the industry to get on with the work it needs to do to implement four-digit CICs.

Last August, the Network Management Committee of the Network Interconnection Interoperability Forum ("NIIF") took up the issue of wording of this announcement and reached

---

<sup>1</sup> Letter from Jonathan B. Sallet, MCI, to Richard Metzger, FCC, dated March 17, 1998, at 5 ("MCI").

<sup>2</sup> Bell Atlantic refers to Bell Atlantic-Delaware, Bell Atlantic-Maryland, Bell Atlantic-New Jersey, Bell Atlantic-Pennsylvania, Bell Atlantic-Virginia, Bell Atlantic-Washington, D.C., Bell Atlantic-West Virginia, New York Telephone Company, New England Telephone and Telegraph Company and Bell Atlantic Communications.

closure on the language in December. The language was adopted at the general session of the whole NIIF in February, with the support of the other interexchange carriers participating in that session. There is no impasse — MCI simply disagrees with everybody else.

MCI claims that some of the language in the industry-approved announcement is “unnecessary and wasteful,”<sup>3</sup> but the fact that the announcement could be more succinct is not reason for the Commission to intervene. MCI also claims, without explanation, that the wording “imposes a significant anti-competitive hardship on IXCs.”<sup>4</sup> Obviously VarTec, which wants to force all exchange carriers to use this announcement,<sup>5</sup> and the interexchange carriers that voted in favor of this wording at the NIIF disagree with MCI on this point.<sup>6</sup>

MCI, this time with VarTec’s support, also objects to the industry’s decision to precede the announcement with a special information tone (“SIT”).<sup>7</sup> Both say that callers will hang up as soon

---

<sup>3</sup> MCI at 3.

<sup>4</sup> MCI at 4.

<sup>5</sup> Letter from James U. Troup, counsel for VarTec, to Geraldine Matise, FCC, dated March 23, 1998, at 1 (“VarTec”).

<sup>6</sup> MCI objects to the sentence, “Your call cannot be completed as dialed.” Information considered by the industry indicated that this type of introductory statement is affirmatively helpful — that it serves to establish a common position with the caller. This type of statement communicates to the caller that “I understand your problem. This call is not completed and now I’m going to give you instructions.” It also establishes with the caller that there has been some sort of problem before offering the resolution. It lets the caller know, “You, the customer, have experienced a problem and we acknowledge it.”

Moreover, it is preferable that the first few words be unnecessary, rather than immediately giving the customer content that she needs to take notes on before she even realizes she has a problem. A caller reaching a recorded announcement is caught off guard. The extra few seconds provided by the initial statement gives the caller an opportunity to prepare to receive the instructions necessary to rectify the situation. Callers immediately receiving instructions without the introductory statement may be forced to listen to the announcement more than once, resulting in increased delay and customer frustration.


<sup>7</sup> MCI at 4; VarTec at 5-6.

as they hear the tone and will not listen to the announcement, but neither provides any basis for this claim.<sup>8</sup>

VarTec acknowledges that SITs have become standard for network announcements.<sup>9</sup> There is good reason for this. These tones are not there just because they sound nice — they actually perform useful functions. Among other things, these tones permit automated devices to recognize that the call has not been completed, which they could not do if only a voice recording were played.<sup>10</sup> For example, “smart” payphones recognize SITs as a signal that the call did not go through and an instruction to return coins to the caller. They should clearly be used with this announcement.

The Commission should promptly reject these requests to modify the NIIF announcement.

Respectfully submitted,



John M. Goodman

Attorney for Bell Atlantic

Michael E. Glover  
Of Counsel

1300 I Street, N.W.  
Washington, D.C. 20005  
(202) 336-7874

Dated: April 10, 1998

---

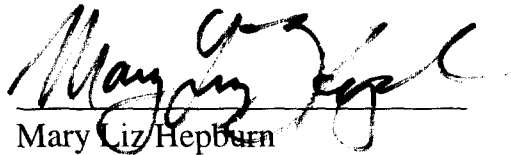
<sup>8</sup> MCI claims to have done “research,” but does not share it with the Commission. MCI at 4.

<sup>9</sup> VarTec at 5.

<sup>10</sup> Bellcore Technical Reference TR-TSY-00067, Special Information Tones (Sept. 1989).

CERTIFICATE OF SERVICE

I, Mary Liz Hepburn, hereby certify that on this 10<sup>th</sup> day of April 1998, a copy of the foregoing Comments was served on the following parties via hand-delivery.



Mary Liz Hepburn

Chief\*  
Network Services Division  
2000 M Street, NW  
Room 235  
Washington, DC 20554

(2 copies)

ITS, Inc.\*  
1919 M Street, NW  
Room 246  
Washington, DC 20554

James U. Troup  
Robert H. Jackson  
Arter & Hadden  
1801 K Street, NW  
Suite 400K  
Washington, DC 20006-1301

Counsel for VarTec Telecom, Inc.

Jonathan B. Sallet  
MCI Communications Corporation  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006